

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

2022 FEB 22 PM 12:02

OFFICE OF THE CLERK

ALLAN SANDERS,

Plaintiff,

vs.

UNION PACIFIC RAILROAD CO.,

Defendant.

4:20CV3023

SPECIAL VERDICT FORM

1. On the claim of plaintiff Allan Sanders for disability discrimination, as submitted in **Instruction No. 13A**, we find in favor of:

Allan Sanders

(Allan Sanders or Union Pacific Railroad Co.)

2. On the claim of plaintiff Allan Sanders for failure to accommodate, as submitted in **Instruction No. 16A**, we find in favor of:

Allan Sanders

(Allan Sanders or Union Pacific Railroad Co.)

If you find in favor of plaintiff Allan Sanders to Question 2, answer the following:

Has it been proved by the defendant that it made a good faith effort and consulted with the plaintiff to identify and to make a reasonable accommodation as instructed in **Instruction No. 30**?

☐ yes
☒ no

If you find in favor of defendant Union Pacific to **both** Question 1 and Question 2, have your foreperson sign and date this form because you have completed your deliberations on these claims.

If you find in favor of plaintiff Allan Sanders to **either** Question 1 or Question 2, answer Question 3 and Question 4.

3. On defendant Union Pacific's defense of direct threat, as submitted in **Instruction No. 17A**, we find in favor of:

Allan Sanders

(Allan Sanders or Union Pacific Railroad Co.)

4. On defendant Union Pacific's defense of business necessity, as submitted in **Instruction No. 18A**, we find in favor of:

Allan Sanders

(Allan Sanders or Union Pacific Railroad Co.)

If you find in favor of defendant Union Pacific to **either** Question 3 or Question 4, have your foreperson sign and date this form because you have completed your deliberations on these claims.

If you find in favor of plaintiff Allan Sanders to **either** Question 3 or 4, answer Question 5, Question 6, and Question 7.

5. We find the plaintiff's lost wages and benefits through the date of this verdict to be:

\$ 375,231.98 (stating the amount or, if

none, write the word "none").

6. We find the plaintiff's future wages and benefits from the date of this verdict to a reasonable point in the future to be:

\$ 549,527.36 (stating the amount or, if

none, write the word "none").

7. We find the plaintiff's other damages, including damages for emotional distress, but excluding lost wages and benefits or future wages or benefits, to be:

\$ 98,665.00 (stating the amount or, if

none, write the word "none").

Foreperson:

Dated:

2/22/22 /